

Appendix 3

EPA's Objections to Knap's Declaration in Support of Knap's Response Doc. 96-3		
1.	Hearsay	Exhibit A (Employment Contract, 69-4, 2-5) Exhibit A (Text Messages, 69-4 , 6, 7) Exhibit B (Salary Calculations, 69-4, 9) Exhibit C (Smartsheet, 69-4, 11, 12)
2.	Relies on hearsay	6, 13, 14, 15, 16
3.	Lack of foundation* Fed. R. Evid. 602	6, 17, 21, 22
4.	Improper legal conclusion	19, 20
5.	Authentication*	Exhibit A (Employment Contract, 69-4, 2-5) Exhibit A (Text Messages, 69-4 , 6, 7) Exhibit B (Salary Calculations, 69-4, 9) Exhibit C (Smartsheet, 69-4, 11, 12)
6.	No objection	2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 18, 23, 24

*Knap's Declaration is attested "to the best of [his] knowledge," raising additional questions under Rules 602 and 901. Doc. 96-3 at 1:21.